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LINDA L. OLIVER
PARTNER
DIRECT DIAL (202) 637-6527

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910

December 10, 1998

BY HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S. W.
Washington, D.C. 20554

**Re: Notice of Ex Parte Communication Regarding Telephone
Number Portability, CC Docket No. 95-116**

Dear Ms. Salas:

Yesterday, on behalf of the Telecommunications Resellers Association ("TRA"), the undersigned of Hogan and Hartson L.L.P. discussed the contents of the attached letter with Tom Power, Legal Advisor to Chairman William E. Kennard. The discussion emphasized the importance of careful Commission consideration of the implications of any delay in implementation of wireless number portability -- for consumers, for competition, and for number conservation efforts. As discussed in the attached letter, if the Commission is not prepared to deny the CTIA forbearance petition on the December 16 deadline, then the Commission should extend the deadline by 90 days to give it the opportunity to weigh these considerations and the TRA alternative proposal for achieving number portability.

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HOGAN & HARTSON L.L.P.

Ms. Magalie R. Salas

December 10, 1998

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I have hereby submitted two copies of this notice to the Secretary, as required by the Commission's rules. Please return a date-stamped copy of the enclosed (copy provided).

Please contact the undersigned if you have any questions.

Respectfully submitted,

A handwritten signature in cursive script, reading "Linda L. Oliver".

Linda L. Oliver
Counsel for Telecommunications
Resellers Association

Enclosure

cc: Tom Power



**Telecommunications
Resellers
Association**

1730 K Street, N.W.
Suite 1201
Washington, D.C. 20006

Tel: (202) 835-9896
Fax: (202) 835-9893

December 4, 1998

The Honorable William Kennard
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Dear Mr. Chairman:

The Cellular Telecommunications Industry Association has filed a forbearance petition with the Commission asking for a minimum five-year delay in implementing wireless number portability (CC Docket 95-116). Unless the Commission approves an extension of time to rule on the petition, it has until December 16 to decide the issue.

TRA believes there is no compelling reason to delay the advent of wireless number portability beyond the March 31, 2000 implementation deadline and has implored the Commission to deny CTIA's petition. In support of our position, we recently filed a report with the Commission laying out in detail a feasible plan for achieving wireless number portability within the allotted time period. The TRA plan meets the Commission's rigid performance criteria yet can be accomplished at considerably less cost to the industry than the enormously complex approach endorsed by carriers.

In light of its viability and important benefits, we believe the TRA plan alone provides ample justification to deny the CTIA forbearance petition. We are concerned, however, that not enough time remains to give our proposal the careful consideration it deserves. Should this be true, we strongly urge you to support delaying a decision on the CTIA petition for 90 days and thus give the Commission, the industry, and the public time to review TRA's simple yet effective approach to achieving wireless number portability by the March 31, 2000 deadline.

The Honorable William E. Kennard
December 4, 1998
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Thank you very much for your time and attention to this request.

Sincerely,

A handwritten signature in cursive script, appearing to read "David Gusky".

David Gusky
Vice President

cc: Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael K. Powell
Commissioner Gloria Tristani
Magalie R. Salas, Secretary
Daniel Phythyon
David Furth
Clint Odum
Jeanine Poltronieri
Lawrence Strickling
Patrick Forster
Anna Gomez
Gayle Radley Teicher